

# **EXHIBIT I**

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<p>1 What test would need to be performed to</p> <p>2 make that determination as to whether there was</p> <p>3 glass tying the flange to the pipe?</p> <p>4 A. There are many tests. I'm not in the</p> <p>5 position to tell you exactly the specification of</p> <p>6 those tests.</p> <p>7 Q. Do you know whether ZAP had performed any</p> <p>8 of those tests at this time?</p> <p>9 A. As far as I know, based on my knowledge,</p> <p>10 they did not.</p> <p>11 Q. Okay. Was there supposed to be glass tying</p> <p>12 the flange to the pipe, glass reinforcement tying</p> <p>13 the flange to the pipe?</p> <p>14 A. Yes.</p> <p>15 Q. Was that glass reinforcement present in</p> <p>16 Selip's piping and flange?</p> <p>17 A. As far as I know, yes.</p> <p>18 Q. How do you know that?</p> <p>19 A. It's the first elementary element that you</p> <p>20 have to apply to manufacturer flanges.</p> <p>21 Q. The last sentence of your email says:</p> <p>22 Please be informed that Selip will not provide any</p> <p>23 further support on-site until the previous</p> <p>24 interventions and invoices will be fully paid.</p>	<p>1 see that?</p> <p>2 Did you review those comments that Marsulex</p> <p>3 had to the Selip report?</p> <p>4 A. I walked through those comments, but</p> <p>5 nothing more than that.</p> <p>6 Q. Okay. Did Selip ever respond to Marsulex's</p> <p>7 comments?</p> <p>8 A. As far as I remember, no, simply because we</p> <p>9 stated to them that once MET refused or rejected to</p> <p>10 pay our assistance and support we were not obliged</p> <p>11 to continue this conversation, especially because --</p> <p>12 yeah, again, our work and our intervention was not</p> <p>13 being recognized.</p> <p>14 Q. Okay. On the first page of this report it</p> <p>15 starts by excerpting some statements from the Selip</p> <p>16 report about picture 7 and picture 8; do you see</p> <p>17 that on page 1 of 4 of this report?</p> <p>18 And there's some photos below that, Photo A</p> <p>19 and B. Are those two photos of the same</p> <p>20 modification that was depicted in pictures 7 and 8</p> <p>21 of the Selip report?</p> <p>22 A. I have no idea.</p> <p>23 Q. Okay. In the third sentence, maybe the</p> <p>24 fourth sentence of the MET comments in red, it says:</p>
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<p>1 What were those invoices for?</p> <p>2 A. When Mrs. Devine were looking for</p> <p>3 intervention and assistance, Mr. Pedrazzi said,</p> <p>4 okay, we can give you all the assistance and support</p> <p>5 that you need. And we went to ZAP. The assumption</p> <p>6 was that Marsulex would have been paid for that</p> <p>7 intervention. And later on the facts reveal that</p> <p>8 was a wrong assumption, especially once we</p> <p>9 identified issues not related to our</p> <p>10 responsibilities.</p> <p>11 Q. So it's your understanding if there's a</p> <p>12 problem caused by Selip then Selip had to pay for</p> <p>13 the intervention, but if it was a problem caused by</p> <p>14 Marsulex or the end-user then Marsulex or the</p> <p>15 end-user had to pay for that?</p> <p>16 A. Sure. It already happened at the very</p> <p>17 beginning, they paid for everything.</p> <p>18 Q. So those invoices were for this April --</p> <p>19 the expense and cost associated with that April 2014</p> <p>20 visit?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. Turning to the last attachment here,</p> <p>23 this MET document dated May 9, 2014, MET comments to</p> <p>24 Selip's final report dated April 11, 2014; do you</p>	<p>1 As can be seen in Photo A, the support was lifted by</p> <p>2 approximately 20 millimeters during operation.</p> <p>3 Were you aware that this support was</p> <p>4 lifting during operation?</p> <p>5 MR. BROPHY: I'll object to the</p> <p>6 foundation of the question.</p> <p>7 You can answer, Mr. Romani.</p> <p>8 THE WITNESS: Can you repeat that</p> <p>9 question?</p> <p>10 BY MR. COE:</p> <p>11 Q. Do you know whether or not this support was</p> <p>12 lifting during operation?</p> <p>13 A. We don't know. It's not something about</p> <p>14 our scope of work here. It's not about our</p> <p>15 business. Again, the operations and the running</p> <p>16 details concerning equipment is not about our scope</p> <p>17 of work.</p> <p>18 Q. Right. You don't know one way or another</p> <p>19 whether this was lifting during operation?</p> <p>20 A. No.</p> <p>21 Q. Okay. It goes on to say: The tie rods in</p> <p>22 the discharge expansion joint restricted the support</p> <p>23 from lifting any higher. The uplift restraints</p> <p>24 shown in picture 8 were added to prevent lifting of</p>

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1 responsible for.

2 Q. Do you know whether that visibility was  
3 provided here?

4 A. No. As far as I know, based on my  
5 knowledge and based on the limitation that we run  
6 through so far, Selip was entitled to the  
7 manufacturing of the FRP components only.

8 Q. And the next sentence MET states: The  
9 maximum pressure in the suction pipe occurs the  
10 instant after the pump is shut down due to the  
11 discharge column of liquid pressurizing the suction  
12 pipe in excess of normal suction operating pressure.

13 Do you have any basis to dispute that  
14 statement?

15 A. No. It's not about our business. We have  
16 no idea what the process is and we're not interested  
17 to know anything about the process.

18 Q. Okay. MET goes on in the next sentence:  
19 It must be noted that when pump A was shut down  
20 there was no additional movement or vibration of the  
21 piping versus operation.

22 Do you have any basis to dispute that  
23 statement that there was no additional vibration  
24 during shutdown?

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1 A. No, I have no idea.

2 Q. All right. We can put that one aside.

3 (At this time, a document was  
4 marked for identification as Exhibit  
5 Romani-11.)

6 BY MR. COE:

7 Q. Mr. Romani, I've just handed you a document  
8 we marked as Exhibit-11. It's a June 3, 2014 email  
9 from Ms. Devine to you, with the Subject C2064 ZAP  
10 Project, Evaluation of Technical External Recycle  
11 Piping of FRP - Serious Failure. Do you recognize  
12 this document?

13 A. Sure. Yes, I do.

14 Q. There are a number of pictures attached to  
15 it. Did you look at those pictures when you  
16 received this email?

17 A. What?

18 Q. Did you look at the pictures when you got  
19 the email?

20 A. Yes, absolutely.

21 Q. What was your reaction when you saw these  
22 pictures?

23 A. To be honest, I was smiling.

24 Q. Why were you smiling?

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1 A. I've never seen in my career or actually  
2 even in a movie an explosion where there is  
3 crystal-clean floor, there is no drop of water,  
4 there's no drop of the slurry product within the  
5 pipe. Everything is positioned properly. And it's  
6 really unusual to see an FRP equipment damaged so  
7 seriously in this way. Even about the building's  
8 damages. I'm not an expert about dynamics of  
9 explosion, but I see unlikely, based on my opinion,  
10 that the building can be damaged by the pressures  
11 applied on FRP equipment mentioned within the  
12 Marsulex specifications. Certainly this kind of  
13 incident might happen if you apply ten times  
14 pressure or three times pressure on the piping. It  
15 could be. I have no idea.

16 Q. Do you think the customer staged this  
17 somehow to make it look like there was an explosion  
18 when there wasn't one?

19 A. Are you asking me an opinion on what  
20 happened?

21 Q. Yes.

22 A. We debated a lot on what happened. And we  
23 really believed in the good faith of the end-user.  
24 And most likely we are not in the position to say

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1 that the explosion doesn't happen, but we, and  
2 myself and all the most expert folks that we have  
3 within the company, we ended up that such kind of  
4 explosion could happen only if you are running a  
5 trial with air, not with product, within the piping,  
6 and exceeding the running pressure you got such  
7 outcomes. That's the only explanation that we  
8 provide ourselves.

9 Q. Why do you call it an explosion?

10 A. What?

11 Q. Why do you call it -- you use the word  
12 explosion to describe this. Why do you call it --

13 A. Looking at the building's damages it looks  
14 like an explosion.

15 Q. Why do you say the picture of the building  
16 looks like an explosion?

17 A. Well, something has been through -- a way  
18 through the walls of the buildings and damages the  
19 walls. It appears like that. I'm not sure whether  
20 it happened or not.

21 Q. So it's just based on the way the walls  
22 look, you think that suggests there was an  
23 explosion?

24 A. Sure. Or at least that's the explanation

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1 my assumption is that yes.  
 2 Q. Is that assumption based on anything other  
 3 than the belief that Selip follows its procedures?  
 4 A. Yes, sir. Within roughly 60 years Selip  
 5 never had such claims and nobody from the Selip  
 6 management board has never be attending deposition  
 7 in U.S. or wherever in the world. So it means that  
 8 we tend to follow procedures concerning FRP, even  
 9 because otherwise we will not be in the market after  
 10 60 years.  
 11 Q. Anything else that that belief or  
 12 assumption is based upon?  
 13 A. No, except the level of expertise that I  
 14 have seen while I'm a Selip representative  
 15 associate.  
 16 Q. Anything else?  
 17 A. No.  
 18 Q. Okay. I just keep on going.  
 19 A. Yeah.  
 20 Q. But is it also your opinion that even if  
 21 that woven roving layer had not continued through  
 22 the hub that the FRP piping that Selip supplied  
 23 still would have met the performance requirements?  
 24 A. Yes.

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1 Q. What is that opinion based on?  
 2 A. The opinion is based on some calculations  
 3 that our engineering made as, you know,  
 4 brainstorming activities in order to see whether  
 5 that could happen. And we ended up with the  
 6 conclusion that in the unlikely case that happened,  
 7 with the thickness of woven roving present on the  
 8 flange, with the bar pressure mentioned within the  
 9 Marsulex specification, the flanges could resist  
 10 anyway.  
 11 Q. Do you save those calculations?  
 12 A. I've seen those calculations, yes.  
 13 Q. Have you produced them to your attorney?  
 14 A. No.  
 15 MR. COE: We'll follow up with  
 16 some requests.  
 17 MR. BROPHY: I'm sure you will,  
 18 probably before I get home.  
 19 MR. COE: No, I'm not that  
 20 excited.  
 21 MR. BROPHY: Before Carlo gets  
 22 home.  
 23 BY MR. COE:  
 24 Q. Let's turn back to page 10. At the very

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1 bottom of page 10 there's a statement that says:  
 2 The Selip drawing indicates a flange made integrally  
 3 in one piece, with many of the layers in the flange  
 4 continuing into the hub and neck of the flange.  
 5 Do you agree with that statement?  
 6 A. Yes.  
 7 Q. Okay. Not the next sentence but the  
 8 sentence after that says: Flange F0 is made by  
 9 laying up the flange and hub layers directly onto a  
 10 piece of straight pipe that had been previously  
 11 fabricated.  
 12 Do you agree with that statement?  
 13 MR. BROPHY: I'm trying to find  
 14 what flange F0 refers to myself.  
 15 MR. COE: Go back to page 6. It  
 16 walks through what sample a flange F0 is.  
 17 MR. BROPHY: Thank you.  
 18 THE WITNESS: Yes, I agree.  
 19 BY MR. COE:  
 20 Q. Turn to page 15, at the bottom it talks  
 21 about Samples of Flange F2 and F3; do you see that?  
 22 A. Yup.  
 23 Q. It says: The flanges at F2 and F3 are laid  
 24 up onto prefabricated elbows and in a different

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1 manner than those laid up onto the straight filament  
 2 wound pipe. The most significant difference is that  
 3 the substrate elbow does not extend fully to the  
 4 flange face as the filament wound pipe does on  
 5 flanges F0, F1 and F4. For some reason the flange  
 6 was not laid up directly on the end of the elbow,  
 7 but rather a small length of straight filament wound  
 8 pipe was inserted as a filler at the end of the  
 9 elbow effectively extending the elbow center-to-end  
 10 length by 80 to 90 millimeters. The short length of  
 11 tapered pipe can be seen in all of the following  
 12 photos.  
 13 Do you agree with that statement that there  
 14 was a small length of straight filament wound pipe  
 15 inserted as a filler at the end of the elbow?  
 16 A. Yes.  
 17 Q. Do you know why that short length of pipe  
 18 was inserted?  
 19 A. I'm not familiar with this manufacturing  
 20 procedure. I can only get there through thought  
 21 process and assumption, but nothing...  
 22 Q. Is that something that would have been  
 23 called for by the drawings or the specifications?  
 24 A. No, I don't know.